United States Marine Safety Association

Mr. Andrew Fanara
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ENERGY STAR for Exit Signs
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1200 Pennsylvania Avenue, N. W
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Reference: OMB Circular A-119, Federal Participation in the Development and on Use of Voluntary Standards

Dear Mr. Fanara:

This is in response to your letter of October 7, 2002 requesting input on Draft 1 Version 3.0 specification for ENERGY STAR qualified Exit Signs.

First, we are pleased that your stated intent is to develop a change that will permit exit signs utilizing photoluminescent technology. It is important to be open to new technology. Use of photoluminescent technology in exit signs is an excellent safety advance and from the energy saving and cost reduction perspective, it is a very significant advance.

Ways should be found to recognize and foster this under the Energy Star program.

But the document as written will not accomplish this very laudable goal.

Specifying that photoluminescent exit sign models may pursue ENERGY STAR qualification only if it can be evaluated with a specific charging light source is unnecessary in that photoluminescent signs are not required by the UL listing to have a specific charging light. The UL label on the signs speaks to the florescent room lighting that is required. The concern about relying on florescent room light was fully addressed by the building officials, fire officials and industry experts from all over the country when exit sign standards permitting photoluminescent signs were developed and adopted. The Energy Star program focus should be on fostering energy consumption reduction not setting new basic safety exit sign performance standards.

Each year, tens of thousands of building officials, fire officials and industry experts from all over the country review existing and proposed building code requirements and standards to insure that the public is provided with an acceptable minimum level of fire and panic safety. These model building/fire codes are then further reviewed by states and local jurisdictions and are adopted and enforced by the building and fire officials of each state. These standards were no exception. Meeting UL 924 and bearing the required label gives assurance that the proper safety design considerations were addressed. Local code and fire officials will assure they are properly installed.

Including the safety performance specifications not associated with energy consumption in the EPA ENERGY STAR qualification standard is not the approach that should be used.

The most appropriate manner for EPA to specify Exit Signs to be associated with the Energy Star program would be to reference and require testing and listing in accordance with minimum safety and performance standards established by the National Fire Protection Association (NFPA 101, Life Safety Code and NFPA 5000, Building Construction and Safety Code) and Underwriters Laboratory (UL 924, UL Standard for Safety for Emergency Lighting and Power Equipment). To address the

energy consumption issue, a provision should be included that would require the energy consumption to be 2.5 watts or less.

EPA should reference these national codes and standards as the basic standard for exit signs and not attempt to write its' own building/fire safety standards. OMB Circular A 199 says in effect, if EPA feels compelled to change the national safety standards for exit signs, then it should do so by participating in the national model code and standards process so that building officials, fire officials and industry experts from throughout the country can hear the arguments and come to a consensus.

Basically what EPA needs to specify is that an exit sign model may pursue ENERGY STAR qualification if it is tested and labeled as meeting Underwriters Laboratory 924, Standard for Safety for Emergency Lighting and Power Equipment by a recognized laboratory and has an energy consumption of 2.5 watts or less.

This approach meets the stated objective of the Energy Star program and complies with OMB Circular A-119, Federal Participation in the Development and Use of Voluntary Standards.

EPA should be addressing the energy consumption standard. The building code and fire protection officials should address performance standards for exit signs. They have done this and the standards cited above are the US standards.

Photoluminescent exit signs have been tested and listed by UL as meeting these standards.

With respect to proper installation, including location, the building code officials and local fire marshals will assure that the signs are in the right place and installed in accordance with any conditions stated on the UL label. This is the standard practice and expectation in the building and exits codes. This is a routine part of the "building code officials' and fire marshals' job. As an example, light fixtures and electrical exist sign may not be placed in hazardous locations unless they have been tested and bear the UL label for the hazardous locations. Code officials and Fire Marshals assure this is met. This philosophy applies for photoluminescent exit signs. While this concern is understandable it is adequately dealt with by current code enforcement practice.

As you state in you letter, the ENERGY STAR label is to make it easy for buyers to identify the most energy-efficient products in the marketplace. The UL label will signify that the signs meet performance standards of the building code rules and other authorities having jurisdiction. These normally are NFPA 101, Life Safety Code and NFPA 5000, Building Construction and Safety Code and Underwriters Laboratory UL 924, Standard for Safety for Emergency Lighting and Power Equipment.

By simplifying the proposal as suggested above, EPA achieves it stated goal on exit sign energy consumption reduction.

Our members that manufacturer photoluminescent signage would be please to brief you and EPA management on this technology.

The enclosure gives some background on USMSA.

Sincerely,
Norman W. Lemley

Norman Lemley
Technical Director

Enclosure

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